

UNITED STATES DISTRICT COURT  
for the  
District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 14-MJ- 1024 (JSM)

ABDULLAHI YUSUF  
ABDI NUR

**CRIMINAL COMPLAINT**

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. Beginning on or before April 1, 2014, and continuing until the present in the State and District of Minnesota and elsewhere, defendant(s)

Conspired to provide material support to a designated foreign terrorist organization and provided material support to a designated foreign terrorist organization.

in violation of Title 18, United States Code, Section(s) 2339B.

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

  
Complainant's signature

John Thomas, Special Agent  
Printed name and title

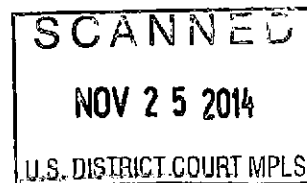
Sworn to before me and signed in my presence.

Date: 11/24/14

City and state: Minneapolis, MN

  
Judge's signature

The Honorable Janie S. Mayeron, U.S. Magistrate  
Judge  
Printed name and title



UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
District Court File No. 14-MJ- 10 24 (JSK)

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

(1) ABDULLAHI YUSUF, and )

(2) ABDI NUR, )

Defendants. )

**AFFIDAVIT IN SUPPORT OF A  
CRIMINAL COMPLAINT AND  
ARREST WARRANT**

I, John P. Thomas, being first duly sworn, hereby depose and state as follows:

STATE OF MINNESOTA )

COUNTY OF HENNEPIN )

SS:

**I. INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been employed by the FBI since 2007. I am currently assigned to the Joint Terrorism Task Force ("JTTF") of the FBI's Minneapolis Division. That has been my assignment since March of 2008. As part of my duties as a Special Agent, I investigate, among other things, criminal violations relating to terrorism, such as material support to designated foreign terrorist organizations. The statements contained in this affidavit are based on information I have learned through my own investigation; my background, training, and experience as a Special Agent assigned to the JTTF; the investigation of other FBI special agents and law enforcement officers; records and other evidence

obtained during the course of this investigation; and discussions with individuals as set forth in this affidavit.

2. This affidavit is intended to show merely that there is probable cause to believe that the defendants, ABDULLAHI YUSUF and ABDI NUR have committed various federal crimes. It does not set forth all of my knowledge about this matter.

## **II. PURPOSE OF THE AFFIDAVIT**

3. I make this affidavit in support of an application for a criminal complaint charging the defendants, ABDULLAHI YUSUF and ABDI NUR with:

Count One, Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization (the Islamic State of Iraq and the Levant), in violation of Title 18, United States Code, Section 2339B (Both Defendants);

Count Two, Providing Material Support to a Designated Foreign Terrorist Organization (the Islamic State of Iraq and the Levant), in violation of Title 18, United States Code, Section 2339B (NUR);

This affidavit is also made in support of an application for a warrant to arrest defendants ABDULLAHI YUSUF and ABDI NUR.

## **III. FACTS CONSTITUTING PROBABLE CAUSE**

### **INTRODUCTION**

4. FBI Minneapolis is investigating numerous individuals who have traveled, attempted to travel, or otherwise seek to travel to Syria in order to involve themselves in the fighting that has consumed Syria for more than three years. Open source materials

indicate that in March, 2011, political opponents of the Assad regime attempted to protest in Damascus and in the southern Syrian city of Deraa. The government security forces in Deraa opened fire, killing many protestors. The level of violence in Syria increased rapidly following the incidents of March, 2011. In an August 2014 report to the United Nations Security Council, the UN's Human Rights Data Analysis Group conservatively estimated the death toll from the violence in Syria at 191,000. Terrorist groups are involved in the fighting in Syria, among which is the Islamic State of Iraq and the Levant ("ISIL") (also known as the Islamic State of Iraq and Syria ("ISIS"), the Islamic State of Iraq and al-Sham (also "ISIS") or as the Islamic State (IS)). This organization will be referred to as "ISIL" for the balance of this affidavit.

5. On May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq as a Foreign Terrorist Organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant as its primary name. The Secretary also added the following aliases to the ISIL listing: the Islamic State of Iraq and al-Sham, the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. Although the group has never called itself "al-Qa'ida in Iraq," this name has frequently been used to describe it through its history. In an audio recording publicly released on June 29, 2014, ISIL announced a formal change of ISIL's name to Islamic State.

## THE GOVERNMENT'S INVESTIGATION

### *BACKGROUND ON DEFENDANT ABDULLAHI YUSUF*

6. Abdullahi YUSUF (hereinafter "YUSUF") is a United States citizen who was born on April 12, 1996 and currently lives with his parents in Inver Grove Heights, Minnesota. At the outset of this investigation, YUSUF was a student at the Heritage Academy Charter School, located at 1042 18<sup>th</sup> Avenue SE, Minneapolis, Minnesota. Based on the reports of FBI surveillance agents, your affiant believes that YUSUF presently attends Inver Hills Community College, located at 2500 80<sup>th</sup> St. East, in Inver Grove Heights, Minnesota. According to one of YUSUF's family members, the father is the only person in the household (consisting of father, mother, YUSUF, and YUSUF's younger brother) who holds a paying job. According to the family member, the father did not purchase any tickets for international air travel for YUSUF, and YUSUF had no independent income and could not afford such a purchase himself.

7. Through this investigation, I learned the following:

a. On April 28, 2014, YUSUF went to the Minneapolis Passport Office and applied for an expedited passport, identifying his travel destination as Turkey.

b. The passport specialist assisting YUSUF said YUSUF arrived alone. YUSUF presented a junior high school identification card, high school identification card, and a Certificate of Citizenship, which satisfied the identification requirement to apply for a passport. Based on YUSUF's

presentment of the high school identification card and his age (18), the passport specialist asked YUSUF if he was traveling after graduation. YUSUF replied that he was not graduating and was traveling to Istanbul for a vacation. When asked who he was traveling with, YUSUF replied that he was traveling by himself. When the passport specialist sought more details about his travel plans, YUSUF responded that "his mom couldn't afford to go and no one else wanted to go with him." YUSUF claimed he was meeting a friend he "met on Facebook not too long ago." Asked if it was a girl he was meeting, YUSUF said, "no it's a guy, just friend."

c. YUSUF did not provide any more details about his friend and, according to the passport specialist, became visibly nervous, more soft-spoken, and began to avoid eye contact. As the conversation continued, the passport specialist learned YUSUF did not know where his "friend" lived in Istanbul. Although YUSUF stated his intention was to go "sightseeing" in Turkey, when asked by the passport officer for details about his sightseeing plans, YUSUF replied that he was going to see "The Blue Mosque" and "some other mosques" and "stuff like that." YUSUF also indicated he would be staying in a hotel, but was unable to provide the name of the hotel or any other details.

d. When the passport specialist asked YUSUF about the cost of the trip, YUSUF responded that the trip would cost "about \$1500." When the passport specialist remarked that \$1500 was costly and inquired how YUSUF

could afford to pay for the trip, YUSUF said he was “tutoring” and had “saved up.”<sup>1</sup> YUSUF advised that he had not received money from his mother, had never been to Turkey, and had no family connections to Turkey.

e. When asked if he was traveling anywhere else, YUSUF responded, “I don’t know yet. I don’t think so.”

f. The passport specialist also observed that YUSUF did not appear excited or happy to be traveling to Turkey for vacation.

g. The passport specialist found his interaction with YUSUF so unusual that he contacted his supervisor who, in turn, alerted the FBI to YUSUF’s intended travel.

8. Approximately one week later, on the morning of May 5, 2014, FBI surveillance observed YUSUF’s father dropping YUSUF off at Heritage Academy. After his father left, YUSUF did not enter the school, but instead walked to a known mosque located approximately two blocks away from Heritage Academy. Later that morning, at approximately 10:30 a.m., FBI surveillance agents watched YUSUF walk from the mosque to a bus station where he boarded a Metro Transit bus. YUSUF took the bus to the Cedar Riverside apartment complex near downtown Minneapolis and then walked towards a light rail station. Within 14 minutes, a separate surveillance team observed

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<sup>1</sup> Agents have confirmed that YUSUF has no reported earnings documented with the Minnesota Department of Employment and Economic Development.

YUSUF enter the Minneapolis Passport Office located in downtown Minneapolis where YUSUF picked up his new passport.

9. Later on May 5, 2014, YUSUF used his new passport as a form of identification to open a checking account, with an associated debit card, at Wells Fargo Bank.

10. On May 23, 2014, YUSUF deposited \$1,500 in cash into his newly-opened Wells Fargo Bank account. The \$1,500 was broken down into four separate deposits spaced throughout the day. The first two deposits were one hundred dollars each, followed by a three hundred dollar deposit, followed by a final deposit of one thousand dollars. All were made at an ATM near the intersection of Lake Street and Nicollet Avenue in Minneapolis. I have reviewed still photographs of the deposits taken automatically by the ATM's camera. The person in each of the surveillance photographs is YUSUF.

11. On May 24, 2014, YUSUF used his Wells Fargo debit card to purchase a \$1,427.05 airline ticket on the website of the priceline.com partner, "Kayak." YUSUF's itinerary was to take him via Aeroflot from Minneapolis/Saint Paul to New York's John F. Kennedy International Airport, where, after an approximately 23 hour layover, he would fly on to Moscow, Russia, where he would catch a connecting Aeroflot flight to Istanbul. YUSUF was scheduled to depart Minneapolis/Saint Paul on May 28, 2014.

12. On May 28, 2014 (the day of YUSUF's intended departure), FBI surveillance agents observed YUSUF's father drop YUSUF off at Heritage Academy.



Approximately one hour after being dropped off, YUSUF left Heritage Academy and walked to the nearby known mosque. YUSUF entered the mosque and just over one hour later, a blue Volkswagen Jetta with a known Minnesota license plate<sup>2</sup> parked near the exit of the mosque. Within a minute of the Jetta's arrival, YUSUF walked out of the mosque and entered the Jetta, departing as a passenger.<sup>3</sup> Surveillance of the Jetta continued as it drove for approximately 15 minutes towards the light rail system and parked near the intersection of E. 45<sup>th</sup> St. and Hiawatha Avenue. This location is approximately 5 blocks from a light rail stop. At this location, both YUSUF and the driver got out of the vehicle and opened the trunk. YUSUF removed a sweatshirt he was wearing and replaced it with a pink button-down dress shirt. While YUSUF was changing clothes, the driver moved objects from a red duffel bag to a black duffel bag. The driver then put both duffel bags and a backpack into the trunk of the Jetta. The driver and YUSUF got back into the Jetta and drove approximately 5 blocks to the light rail station and parked. Inside the vehicle, YUSUF hugged the driver and got out of the Jetta. After retrieving the black duffel bag and black backpack from the trunk of the Jetta, he walked to the light rail and boarded a

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<sup>2</sup> Agents know that the registered owner of the Jetta is the boyfriend of co-defendant ABDI NUR's sister. According to a witness familiar with the vehicle, NUR was given permission to use the blue Jetta in the days prior to YUSUF's attempted departure.

<sup>3</sup> A review of telephone toll records obtained by subpoena reveals that YUSUF called NUR after he arrived at the mosque and that NUR called YUSUF approximately 4 minutes before YUSUF was picked up at the mosque by the Jetta.

train which took him to the Minneapolis/St. Paul International Airport (Lindbergh Terminal).

13. My review of reports of interviews of YUSUF's parents revealed that, according to both parents, YUSUF planned his travel, obtained his passport, purchased his airline ticket to Turkey, and packed his bag all without their knowledge.

*YUSUF MAKES FALSE STATEMENTS WHEN HE IS INTERVIEWED AT THE  
AIRPORT BY FBI AGENTS*

14. On May 28, 2014, I conducted an interview of YUSUF at the airport after advising YUSUF that he would not be permitted to travel to Turkey as he had planned. During this interview, I learned the following:

- a. YUSUF stated he was traveling to Turkey for a two-week vacation.
- b. YUSUF indicated he had no plans to travel beyond Turkey.
- c. When asked if his parents knew where he was, YUSUF stated, "yes." As noted above, this statement was contradicted by YUSUF's parents.
- d. YUSUF stated that he paid for his own ticket by saving up money. As noted above, YUSUF did not have the means to save up money nor has any income for YUSUF been reported to the State of Minnesota.
- e. When asked who he would see in Turkey, YUSUF stated "I wasn't gonna meet anybody." When advised that he previously told the Passport Office that he was going to visit someone he met on Facebook, YUSUF said, "I said I have a couple friends on Facebook from Turkey." I have reviewed YUSUF's

Facebook page. He has no Facebook friends who identify themselves as Turkish, as being in Turkey, as being from Turkey, or as being associated with Turkey in any other way.

f. When asked about his plans in Turkey, YUSUF stated that he planned to "Go to the Blue Mosque, the Grand Bazaar, a lot of places. Go sightseeing."

g. YUSUF maintained he was traveling to Turkey on vacation. When told agents did not believe him, but instead believed he was ultimately traveling to Syria to join a terrorist organization, YUSUF responded, "I've never committed a crime. I never committed no terrorist crimes that you're accusing me of." He stated his belief that the FBI learns information primarily through informants and said it was his "word against theirs." YUSUF asked the agents how the FBI would prove in a court of law what an informant said about him was true.

h. When asked if his parents knew where he was, YUSUF responded, "yes" and said he told them he "was gonna be gone for awhile." When asked if his father knew he was flying overseas, YUSUF said, "I don't think he cares."

i. YUSUF was not able to identify who he was meeting, other than a "couple friends on Facebook from Turkey." When asked where he was staying, YUSUF initially provided the name of a hotel, but later said he would just take a cab from the airport in Istanbul to a hotel. YUSUF did not have a travel itinerary

and said he was going to visit “the Blue Mosque, the Grand Bazaar, a lot of places. Go sightseeing.”

*NUR DEPARTS MINNESOTA FOR TURKEY*

15. The description and license plate number of the Volkswagen Jetta described in paragraph 13 above was circulated to law enforcement agencies. The Minneapolis Police Department located a police report documenting the Jetta’s involvement in a minor accident one week before YUSUF’s attempted travel. The Minneapolis Police report identified the driver of the Jetta at the time of the accident as ABDI NUR (“NUR”), a 20 year-old United States citizen of Somali descent, born on April 1, 1994. The reports generated by the responding officer noted that the VW Jetta had a broken driver’s side rearview mirror.

16. The FBI then attempted to ascertain NUR’s whereabouts and involvement, if any, in facilitating travel to Syria. On May 29, 2014, the FBI learned that, earlier that day, NUR had departed on a flight from Minneapolis/Saint Paul International Airport, and was scheduled to arrive in Istanbul, Turkey on May 30, 2014, following layovers in Newark, New Jersey, and Munich, Germany.

17. NUR’s banking records were obtained and reviewed. That review showed that on May 27, 2014, a \$1,540 cash deposit was posted to NUR’s account at Wells Fargo Bank. ATM surveillance video shows that at approximately 11:00 AM on May 24, 2014 NUR deposited the \$1,540. On May 27, 2014, NUR paid Lufthansa \$1,619.30, using his Wells Fargo debit card, for the travel described above in this affidavit. The

investigation has shown that, like YUSUF, NUR was unemployed at the time he bought this ticket and did not have the financial means to purchase an international airline ticket. Also of note, agents know that NUR deposited \$160 at the same ATM near Lake Street and Nicollet Avenue on the same day that YUSUF deposited his funds as described in paragraph 11 of this affidavit. The \$160 deposit by NUR was made within 19 minutes of the third of YUSUF's first three deposits on May 27th. Further, when YUSUF made the \$1,000 deposit later in the evening at the same location, he did so at a drive-up teller which captured an image of YUSUF in a vehicle making the deposit. Your affiant has reviewed this image and notes that the vehicle used by YUSUF has a broken driver's side rearview mirror and is blue in color. Also, a second individual can be seen in the vehicle's front passenger seat with YUSUF but this individual cannot be identified from this image.

18. From my review of NUR's travel itinerary, I learned that NUR's return flight was scheduled for June 16, 2014. Agents have confirmed that NUR was not aboard his scheduled return flight and there is no record that NUR has since lawfully re-entered the United States.

#### *NUR'S PRE-DEPARTURE ACTIVITIES*

19. According to interviews with NUR's family, NUR was unemployed at the time of his departure from Minnesota. NUR's family stated that his only recent receipt of money had been the disbursement of a \$2,000 student loan; however, they reported NUR spent almost the entire \$2,000 on a new computer and an iPhone.

20. Further queries revealed that NUR obtained his U.S. Passport on April 24, 2014, four days before YUSUF applied for his passport. Both NUR and YUSUF's passport applications were submitted with their request to have processing of the application expedited. On NUR's passport application, NUR stated he planned to travel to Australia in early June of 2014.

21. On May 30, 2014, Witness 1, a close relative of NUR, walked into the Minneapolis Police Department's 5<sup>th</sup> Precinct stationhouse to report NUR missing.

*NUR's ELECTRONIC COMMUNICATIONS SUGGEST HE HAS TRAVELED TO SYRIA  
TO JOIN A TERRORIST ORGANIZATION*

22. On May 30, 2014 and again on May 31, 2014, an FBI Agent interviewed Witness 1. During these interviews, Witness 1 showed the Agent communications Witness 1 had exchanged with NUR since his departure from the United States. From my conversations with the Agent, I learned Witness 1 exchanged messages with NUR by both Kik<sup>4</sup> and Facebook.

a. From my subsequent review of the Kik communications between NUR and Witness 1, I learned the following:

i. NUR stated that he had gone "to the brothers".

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<sup>4</sup> Based on my training and experience, and conversations with other agents, I know Kik is a Canadian-based company that does not maintain records of user conversations. The Kik application is accessed via internet and unlike other messaging applications, Kik is accessed by username and password instead of the user's phone number.

ii. NUR also stated we “will see each other in afterlife inshallah” (sic) and advised Witness 1 “You cant come looking for me its to late for that” (sic); and “im not coming back” (sic).

iii. When Witness 1 replied “going to kill poor people is not the answer also poor Muslims I know u r playing to go to sirya but please change mind” (sic), NUR did not refute his/her accusation, but instead replied, “And everybody dies but I want the best death [name of Witness 1] and take care of hooyo<sup>5</sup> for me inshallah”.

b. From my review of the contemporaneous Facebook communications between NUR and Witness 1, I learned the following:

i. When Witness 1 implored NUR to “respond to me I love u and can’t live knowing this” NUR stated “I told you I cant be talking to you [name of Witness 1], what are the questions you have so I can answer them [name of Witness 1] you have to stop talking to me till I talk to you okay” (sic).

ii. NUR also stated that “im not scared subhanallahallah put ease in my heart but im very busy nooh but tell hooyo I said salams and ill call you guys in 3 days inshallah [Witness 1].”<sup>6</sup>

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<sup>5</sup> I know “hooyo” to be the Somali language term for “mother.”

<sup>6</sup> Subhanallah means “Glorious is God” in the Arabic language; “salams” means “peace” in the Arabic language and is a commonly used greeting.

iii. When Witness 1 advised NUR that "I don't want to lose you" (sic), and further stated that NUR's father "went into shock and is not talking." NUR replied "If I didnt care I wouldnt have left but I want jannah<sup>7</sup> for all of us."

iv. NUR also told Witness 1 "You have to be strong [Witness 1] im gonna go now and you wont hear from me for a while [Witness 1] love you and may allah make it easy for you".

23. I also viewed the publicly available content on NUR's Facebook account and observed several pictures of lions<sup>8</sup>, one picture of a person holding a t-shirt that says "Syria" on the front, and another image that states "The Caliphate is Coming."<sup>9</sup> I also am aware that NUR is Facebook "friends" with Mohamed Abdullahi Hassan, a/k/a "Miski" ("MISKI") who in 2009 was indicted by a grand jury of this district with Conspiracy to

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<sup>7</sup> Jannah refers to Heaven. Based on your Affiant's experience investigating Islamist extremism, your Affiant knows that it is common for recruits to be told that if they die while fighting jihad that not only will they be granted entry to Jannah, but they will be able to guarantee entry for a number of other individuals even if the other individuals were not devout Muslims.

<sup>8</sup> Your Affiant knows that militant Islamic extremists like to refer to themselves as lions, as in "Lions of Allah" or "Lions of Somalia". This is a reference to being a strong warrior for the cause of *jihad*. For example, on or about May 11, 2012, Ayman al-Zawahiri, the leader of al Qaeda, issued a statement "O Lions of Somalia, Do Jihad Against the Descendants of Abu Raghaf" that was addressed to members of al Shabaab.

<sup>9</sup> Your Affiant knows the "caliphate" is a reference to land that is controlled by an Islamic supreme religious and political ruler. Based on training and experience, your Affiant is aware that references to "expanding", "returning" and "regaining" the caliphate are common themes among Islamic extremists.



Provide and Providing Material Support to Terrorists, in violation of 18 U.S.C. § 2339A; Conspiracy to Provide and Providing Material Support to a Foreign Terrorist Organization, in violation of 18 U.S.C. § 2339B; and Conspiracy to Kill Abroad, in violation of 18 U.S.C. § 956. From my review of this indictment (09-cr-50-MJD/FLN), I know MISKI left the United States on August 2, 2008, to join al Shabaab in Somalia. As of this writing MISKI remains a fugitive from justice.

24. I have also reviewed the contents of a series of private conversations on Facebook occurring between August 9<sup>th</sup> and August 14<sup>th</sup> of 2014 between NUR and MISKI which were obtained by executing a search warrant on Facebook.

- a. Among other topics, NUR (then believed to be in Syria) asks MISKI (then believed to be in Somalia) to pass a message to a mutual friend: "...send him my salams ahki and when your in jihad you forget a lot of ppl [people] back in the past so remind him that the salams came from abdiyare [NUR] that you went to southwest [high school] with." When NUR asked if he could speak with this person, MISKI replied "...Insha Allah he's went to the frontlines..."
- b. MISKI asked NUR: "...us brothers from mpls [Minneapolis] wanted to know how many you guys are back there in sham [Syria/Iraq]?" NUR replied, "...only three of us the others there still workin making hijrah<sup>10</sup>..."

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<sup>10</sup> The term "hijra" is a migration or journey.

- c. After asking NUR if he knew "Duale" (a U.S. citizen known to have traveled to Syria), MISKI advised NUR "...try to all connect and make one of you guys mas'uul to know your affairs...Being connected in Jihad make you stronger and you can all help each other by fulfilling the duties that Allah swt put over you...Like us in Somalia the brothers from mpls are well connected so try to do the same....It is something we have learned after 6 years in Jihad."
- d. To this, NUR replied: "...inshallah and its hard to stay together in dawla<sup>11</sup> ahki they move you around from place to place if theres a mahrasah so even worse if you come to sham different times..."
- e. MISKI later tells NUR: "Jihad teaches you to have as much connection as you can from other Jihadi fronts. That's some lessons we got the past 6 years."
- f. On August 13, 2014, MISKI asks NUR how things are. NUR replies, "...good bro, just getting ready for a mahrasah soon IA against pkk<sup>12</sup> inshallah where done with frontline rabat now were planning on attacking

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<sup>11</sup> A cycle, period, or a time of success.

<sup>12</sup> "PKK" is an acronym for the Kurdistan Workers' Party.

them soon...but IA today or tomorrow the brothers will take over the airport in dabkah<sup>13</sup>,”

#### *THE RECENT RADICALIZATION OF NUR*

25. During the interviews described above, Witness 1 also told the FBI that NUR had become “much more religious” over the course of the previous two months.<sup>14</sup> According to family, NUR had begun talking about how his family needed to change, to pray more, and to dress in more traditional clothing. Witness 1 stated that NUR also began talking about jihad. Witness 1 stated that this change in NUR coincided with his beginning to attend a known mosque in Bloomington, Minnesota.

26. After learning that NUR had left Minneapolis, Witness 1 went to the known mosque in Bloomington and confronted several individuals with whom NUR had been associating since attending the mosque. One of the individuals stated that NUR’s ticket had been paid for and that NUR was likely already leaving.

#### *DOCUMENTS IN THE VOLKSWAGEN JETTA PROVIDE FURTHER EVIDENCE OF TRAVEL TO SYRIA TO JOIN A TERRORIST ORGANIZATION*

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<sup>13</sup> Your affiant knows that on or about August 24 ISIL fighters attacked the Syrian air base called “Tabqa”. Your affiant believes the word “dabkah” is a phonetic reference to this air base. According to news reports, over 500 persons were killed in the fighting, and a number of Syrian prisoners of war were beheaded by ISIL.

<sup>14</sup> Your affiant notes that NUR and MISKI became Facebook Friends almost exactly two months before the May 30, 2014, interview with Witness 1.

27. In social media messages NUR also told his relative that he had abandoned the Jetta and told his relative the location near a light rail station where it could be found. The owner of the vehicle gave the FBI consent to search the Jetta. In that search several items of interest were found. Among those items was a receipt for the purchase of Nike-brand athletic wear made at a Macy's store at the Southdale Mall in Edina, Minnesota. A review of Macy's video surveillance footage and transactional information revealed YUSUF and NUR were together at the Macy's store on the evening prior to YUSUF's attempted departure. Both YUSUF and NUR purchased Nike clothing at Macy's on May 27, 2014. Based upon the transactional information available, the Macy's receipt found in the Jetta matches the purchase by YUSUF and NUR depicted in the video surveillance footage. Finally, a piece of paper was found in the Jetta on which was written the handwritten words "Chicago, IL O'Hare intl Airport" with a hand-drawn arrow to the handwritten words "Gaziantep, turkey - Sazgin Airport." Gaziantep is a city in southern Turkey, near the Syrian border. Gaziantep is approximately fifty miles from Aleppo, Syria, where heavy fighting between Syrian government forces and various opposition groups, including ISIL, has been ongoing for approximately two years.

*YUSUF's FURTHER CONNECTIONS TO INDIVIDUALS WHO HAVE TRAVELED  
FROM THE UNITED STATES TO COMMIT UNLAWFUL VIOLENCE OVERSEAS*

28. I am aware that YUSUF is an associate of H.M., a former Minnesota resident now believed to be fighting in Syria. The investigation into H.M.'s conduct has revealed that H.M. traveled from Minnesota to Turkey on March 9, 2014. Agents have learned that the debit card used to purchase airline tickets for H.M.'s travel from

Minnesota to Turkey was also used to purchase airline tickets for a third traveler who flew to Turkey on the same day that H.M. traveled from Minnesota to Turkey. Further, subsequent investigation has shown that H.M. has not lawfully re-entered the United States. YUSUF queried H.M.'s Facebook account seven days after H.M. departed the United States for Syria.

29. Consistent with the payment pattern described in this affidavit for YUSUF and NUR, cash deposits were made into the account used to purchase H.M.'s and the above-referenced third traveler's tickets in the days immediately preceding the purchase of their tickets for their travel to Turkey.

30. Information provided to the FBI from H.M.'s family includes the fact that H.M.'s departure was unexpected and unknown to immediate family, and that three of H.M.'s cousins are known to have traveled to Syria. H.M. had visited with these cousins prior to all three of their departures. Further, during phone conversations with a family member that took place in March of 2014, H.M. confirmed that he was, in fact, in Syria serving as a "border guard" and that he believed he would go to jail if he returned to the United States.

31. YUSUF is Facebook "Friends" with H.M., and a review of telephone records shows several phone calls and text messages between YUSUF and H.M., including a two minute call between the telephone of YUSUF's father (believed, however, to have been used by YUSUF) and H.M., two days before H.M.'s departure for

Syria. One week after H.M.'s departure from Minneapolis, YUSUF conducted a query on Facebook for H.M..

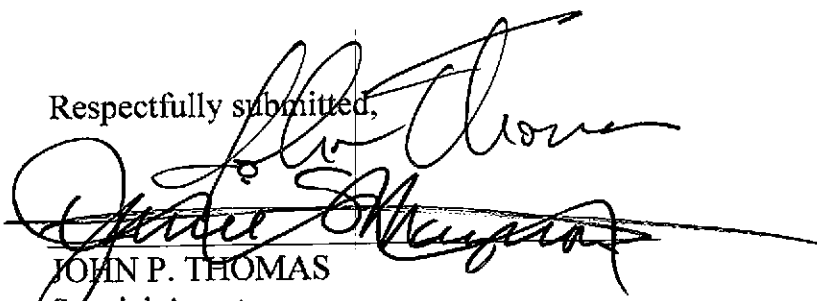
32. A review of YUSUF's Facebook account reveals that his profile picture depicted a man with the head of a lion. Further, in February of 2014, he posted the following: "Bashaar asad don't deserve to live."

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### CONCLUSION

33. Based on the foregoing, I respectfully submit to this Court that there is evidence amounting at least to probable cause to believe that YUSUF and NUR have committed the federal crimes specified above in this affidavit, and that the nature of these crimes, and YUSUF's attempted international travel, further supports the issuance of warrants by this court for the arrest of Abdullahi YUSUF and Abdi NUR.

Respectfully submitted,

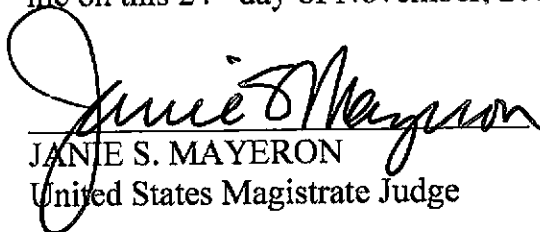


JOHN P. THOMAS

Special Agent

Federal Bureau of Investigation

Subscribed and sworn to before  
me on this 24<sup>th</sup> day of November, 2014.



JANIE S. MAYERON

United States Magistrate Judge